

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
C.S., a minor by and through his guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
J.S., a minor by and through her guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
M.S., a minor by and through her
guardian *ad litem* Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

Plaintiffs,

v.

CITY OF HUNTINGTON PARK; DOES
1 through 10, inclusive,

Defendants.

Case No.: 2:23-cv-09412-CBM-AGR

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**JOINT STIPULATION TO ALLOW
PLAINTIFFS TO AMEND
COMPLAINT TO NAME THE
OFFICERS WHO USED DEADLY
AND LESS-LETHAL FORCE IN
PLACE OF DOE DEFENDANTS 1-4**

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between Plaintiffs D.S., a minor by
3 and through his guardian *ad litem* Elsa Acosta; C.S., a minor by and through his
4 guardian *ad litem* Elsa Acosta; J.S., a minor by and through her guardian *ad litem*
5 Elsa Acosta; M.S., a minor by and through her guardian *ad litem* Elsa Acosta, and
6 Defendant CITY OF HUNTINGTON PARK (“the Parties”), by and through their
7 respective attorneys of record, as follows:

- 8 1. Plaintiffs filed their Complaint on November 7, 2023. At the time of the
9 filing of their Complaint, Plaintiffs were genuinely ignorant of the names
10 of the City of Huntington Park Police Department employees and/or
11 individuals who used force during the incident giving rise to this lawsuit.
12 Subsequently, through discovery, Plaintiffs have discovered information
13 that Officers Nick Nichols, Rene Reza, Matthew Rincon, and April
14 Wheeler are the City of Huntington Park Police Department employees
15 who discharged their firearms and used less-lethal weapons during the
16 incident giving rise to this lawsuit.
- 17 2. The Parties agree that Plaintiffs may file an amended complaint for the
18 purpose of naming Officers Nick Nichols, Rene Reza, Matthew Rincon,
19 and April Wheeler as individual defendants and identifying the force used
20 by each. A copy of Plaintiffs’ proposed First Amended Complaint is
21 attached hereto as “Exhibit A.”
- 22 3. Counsel for the City of Huntington Park agrees to accept service of the
23 First Amended Complaint on behalf of the City of Huntington Park and
24 the individual defendants.
- 25 4. Plaintiffs shall have 7 days to file their First Amended Complaint after the
26 Court grants them leave. Defendant City of Huntington Park shall have 21
27 days thereafter to file a responsive pleading.

1 IT IS SO STIPULATED.

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3 DATED: July 1, 2024

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5 By: 

Dale K. Galipo
Benjamin S. Levine
Attorneys for Plaintiffs

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10 DATED: July 1, 2024

**ALVAREZ-GLASMAN & COLVIN
ARNOLD M. ALVAREZ-GLASMAN
CITY ATTORNEY**

11
12 By: 

Roger A. Colvin
Christy M. Garcia
Attorneys for Defendant
City of Huntington Park